

EXHIBIT 4

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, JOHN DOE, JANE DOE 1, JANE
DOE 2, and JANE DOE 3,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSELY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOCH”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

JURY TRIAL DEMANDED

DECLARATION OF JOHN DOE

I, John Doe, declare as follows.

1. I am over the age of eighteen years, and the facts set forth herein are true and correct to the best of my personal knowledge, information, and belief.

2. I am a male, African-American undergraduate at the University of Virginia (“UVA”), and a resident of Charlottesville, Virginia.

3. On August 11, 2017, I peacefully protested Defendants’ neo-Nazi and white supremacist march in Charlottesville, at the UVA Rotunda and statue of Thomas Jefferson. I was with approximately 30 other protesters, and was one of the few African-American men present.

4. Me and the other protesters locked arms around the Thomas Jefferson statue, as hundreds of neo-Nazi and white supremacist marchers reached the Rotunda. They circled us and shouted racist and anti-Semitic threats and chants, including making monkey noises at the black protesters, and shouting “blood and soil” (a Nazi slogan) and “Jews will not replace us.” The marchers also threw torches at our group, and sprayed me with mace or another type of caustic substance, which made my eyes burn and made it hard to breathe. I was terrified and feared for my life, but was able to escape.

5. On August 12, 2017, I again protested Defendants’ neo-Nazi and white supremacist march. Again, Defendants and the other marchers chanted anti-Semitic, racist, and pro-Nazi slogans that day, including “Heil Hitler,” “Jews will not replace us,” and “blood and soil.”

6. I suffered numerous emotional injuries as a result of the events on August 11-12, 2017. I’ve had difficulty focusing in school, and when I walk past the Thomas Jefferson statue on campus, I immediately recall the harm, threats, and fear I suffered. I also have trouble sleeping, and developed a heightened, anxious sense of awareness in public spaces.

7. After the events on August 11-12, I met with a security expert and have taken steps to increase my safety and guard against further harm from Defendants and their supporters.

8. I fear that if my identity is disclosed in this action, I will be targeted by Defendants and/or their supporters and sympathizers because I am an African-American plaintiff and was a counter-protester, and will be subjected to further threats, harassment, violence, and other physical and mental harm.

I declare under penalty of perjury under the laws of the United States of America that the above is true and correct. Executed this 13th day of November, 2017 in Charlottesville, Virginia.

/s/ John Doe
John Doe

153683745